

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

CDI CORPORATION,	§	
	§	
	§	
Plaintiff,	§	
	§	
vs.	§	CIVIL ACTION NO. 4:11-cv-03487
	§	
GT SOLAR, INC.,	§	
n/k/a GT ADVANCED TECHNOLOGIES,	§	
INC.	§	
	§	
Defendant.	§	

**PLAINTIFF'S INITIAL DISCLOSURES**

Plaintiff CDI Corporation ("Plaintiff" or "CDI"), by and through its undersigned counsel, hereby files Plaintiff's Initial Disclosures, pursuant to Rule 26(a) of the Federal Rules of Civil Procedure.

**GENERAL STATEMENTS**

1. By identifying persons in this document, Plaintiff does not admit or deny the relevancy or admissibility of their testimony, or their availability or suitability as witnesses.
2. By identifying documents and tangible things in this document, Plaintiff does not admit or deny the relevancy or admissibility of any document.
3. Plaintiff reserves the right, if appropriate, to make objections to the production of any documents or tangible things or the answering of any interrogatories regarding any of the matters discussed herein. Fed. R. Civ. P. 33 and 34.

**INITIAL DISCLOSURES**

1. The name and, if known, the address and telephone number of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information:

**(i) Persons likely to have discoverable information:**

**The following persons, who are believed to be presently or formerly employed by Defendant GT Advanced Technologies, Inc. ("GT"), may have knowledge about the Teaming Agreement, GT's relationship with CDI, the Formosa project, GT's solicitation of companies to perform engineering services during the period of the Teaming Agreement, the amount paid by GT for those engineering services, GT's marketing efforts, and/or other facts relevant to this matter:**

Dave Keck  
GT Solar, Inc. n/k/a GTAT Corporation  
101 E. Front Street, Suite 401  
Missoula, MT 59802  
Telephone: 406.728.6200

Chuck Paynter  
GT Solar, Inc. n/k/a GTAT Corporation  
101 E. Front Street, Suite 401  
Missoula, MT 59802  
Telephone: 406.728.6200

Michael Brown  
GT Solar, Inc. n/k/a GTAT Corporation  
101 E. Front Street, Suite 401  
Missoula, MT 59802  
Telephone: 406.728.6200

Hoil Kim  
GT Solar, Inc. n/k/a GTAT Corporation  
101 E. Front Street, Suite 401  
Missoula, MT 59802  
Telephone: 406.728.6200

John Hill  
GT Solar, Inc. n/k/a GTAT Corporation  
101 E. Front Street, Suite 401  
Missoula, MT 59802  
Telephone: 406.728.6200

Halvor Kamrud  
GT Solar, Inc. n/k/a GTAT Corporation  
101 E. Front Street, Suite 401  
Missoula, MT 59802  
Telephone: 406.728.6200

Dave Buset  
GT Solar, Inc. n/k/a GTAT Corporation  
101 E. Front Street, Suite 401  
Missoula, MT 59802  
Telephone: 406.728.6200

Tom Gutierrez  
GT Solar, Inc. n/k/a GTAT Corporation  
101 E. Front Street, Suite 401  
Missoula, MT 59802  
Telephone: 406.728.6200

**The following persons are believed to be employed by Formosa Chemicals and Fibre Corporation, and may have knowledge about the Formosa project:**

Frank Huang  
201 Tung Hwa North Road  
105 Taipei, Taiwan  
Telephone number unknown

H.C. Yang  
201 Tung Hwa North Road  
105 Taipei, Taiwan  
Telephone number unknown

**The following persons are present or former employees of CDI, and may have knowledge about the Teaming Agreement, CDI's relationship with GT, the Formosa project, CDI's engineering services, and/or other facts relevant to this matter:**

Walter Teesdale  
CDI Engineering Solutions  
9800 Centre Parkway, Suite 300  
Houston, TX 77036  
Telephone: 215.282.8050

Andy Johnson  
CDI Engineering Solutions  
9800 Centre Parkway, Suite 300  
Houston, TX 77036  
Telephone: 215.282.8050

Stuart Sklar  
CDI Engineering Solutions  
9800 Centre Parkway, Suite 300  
Houston, TX 77036  
Telephone: 215.282.8050

Robert Giorgio  
CDI Engineering Solutions  
9800 Centre Parkway, Suite 300  
Houston, TX 77036  
Telephone: 215.282.8050

Richard Giannone (former employee)  
Address unknown  
Telephone: 443.350.3177

John Dickerson (former employee)  
Address and telephone number unknown

Keith Landry (former employee)  
URS Corporation  
10550 Richmond Avenue, Suite 155  
Houston, TX, 77042  
713.914.6699

**All current and former employees of CDI may be contacted through Plaintiff's Counsel. There may be additional witnesses or non-parties with information relevant to the disputed facts who are unknown to CDI at this time. CDI reserves the right to supplement these Initial Disclosures accordingly. Also, all of the individuals listed above may have information on subjects in addition to those noted above.**

2. A copy of, or a description by category and location of, all documents, electronically stored information, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

**ANSWER:**

**CDI states that it has possession, custody, or control of the following documents:**

- a. Documents and communications regarding the Teaming Agreement.**
- b. Documents and communications regarding the Formosa project.**
- c. Documents and communications regarding CDI's engineering services.**
- d. Documents regarding GT's marketing of its services for TCS technology and engineering services.**
- e. Documents regarding GT's provision of TCS technology for clients during the term of the Teaming Agreement.**

**These documents are located primarily at CDI's Houston office. Relevant documents not subject to privilege or other objection will be made available at a mutually agreed upon time and place. CDI reserves the right to obtain and use documents in the possession, custody, or control of GT and other third parties, in support of its claims.**

3. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including material on the nature and extent of injuries suffered.

**ANSWER:**

**CDI seeks all damages available under the law, including but not limited to compensatory damages, punitive damages, and attorneys' fees. CDI was denied fees from the Formosa project, and potentially other projects where GT provided TCS technology during the period of the Teaming Agreement and did not use CDI for the basic engineering packages, or BEPs, for those projects. A detailed computation of damages and their categories is still being determined.**

4. For inspection and copying under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**ANSWER:**

**As Plaintiff in this action, there are no claims against CDI whose judgment could result in an order for anyone to indemnify or reimburse, or otherwise, make payments to satisfy the judgment.**

5. Plaintiff reserves the right to supplement this disclosure as discovery in this case proceeds.

Respectfully submitted,

BECK, REDDEN & SECREST, L.L.P.

By: /s/ Timothy Cleveland

Alistair B. Dawson  
State Bar No. 05596100  
S.D. Tex. I.D. No. 12864  
1221 McKinney, Suite 4500  
Houston, Texas 77010  
Telephone: (713) 951-3700  
Facsimile: (713) 951-3720

Timothy Cleveland  
State Bar No. 24055318  
S.D. Tex. I.D. No. 883264  
515 Congress Avenue, Suite 1750  
Austin, Texas 78701  
Telephone: (512) 708-1000  
Facsimile: (512) 708-1002

ATTORNEYS FOR  
PLAINTIFF CDI CORPORATION

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing pleading was served in compliance with the Federal Rules of Civil Procedure on this 13th day of February, 2012.

/s/ Timothy Cleveland

Timothy Cleveland